

ADRIAN BLOCKER
GENERAL MANAGER
WOOD PRODUCTS

6400 POPLAR AVENUE
MEMPHIS TN 38197

T 901 419 1860
F 901 214 0950
adrian.blocker@ipaper.com



October 11, 2006

Dave Walls
Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

RE: California State Fire Marshal's Proposed Code Changes

Dear Mr. Walls:

Thank you for taking the time to consider our comments on the proposed changes by the California State Fire Marshal, including 995 amendments, to the International Building Code.

International Paper supports the collective International Building Code with the fewest possible amendments, as this represents the safest, most current provisions. The provisions within the IBC were established through careful review and consideration by experts including code officials, safety professionals, and design and construction professionals.

Many of the 995 proposed amendments included provisions from previous editions of the California Building Code. As part of the process for developing the model codes, the International Code Council reviewed the Uniform Building Code, and found these provisions to be outdated. They were replaced in the IBC with updated versions, backed by research showing these provisions provide the latest in building technology.

Among the proposed amendments, we are specifically concerned about the following:

- California law requires the "Nine Point Criteria Analysis" for proposed amendments to the code, specifically in place to assure that increases in safety are balanced against any increase in cost of construction. These have not been addressed in developing the current package of amendments. No analysis has been offered to substantiate the claims of increased fire safety. Furthermore there is no substantiation provided supporting the claim that added costs of construction are insignificant.
- Analysis conducted by the American Institute of Architects shows dramatic increases in construction costs without accomplishing any increases in fire safety.
- Every other state with a mandatory statewide building code has recognized the new ICC codes as representing the state-of-the-art and appropriately adopted them without substantive amendment.
- The local amendments proposed will cause the California building code to be significantly different from the International Building Code adopted in every other state. Designers will be forced to spend valuable time and effort learning a unique California building code instead of using the code familiar elsewhere in the U.S.

- Height and area provisions of the IBC, now proposed for local amendment, were in fact developed by a committee chaired by a California code official with equal representation for California and other “western” building officials.
- The local amendments proposed will result in the California building code being significantly different from the International Building Code adopted in every other state. Designers will be forced to spend valuable time and effort learning a unique California building code instead of using the code familiar elsewhere in the U.S.
- With respect to seismic and fire conditions, other states, with earthquake hazard zones and wildland interface zones similar to California’s, have not found data to support amendments such as those proposed in California to address these hazards.
- The IBC is a set of inter-related requirements for fire and life safety, structural issues, accessibility, durability, and serviceability. It is a system. The manner in which individual provisions relate to each other and work together to provide comprehensive levels of safety at acceptable costs are not provided when specific sections are arbitrarily changed.
- Other building codes contain comparable, if not even more liberal provisions. Nevertheless, we believe that available data supports the *International Building Code* provisions for building height, building area, sprinkler increase factors and area modifiers, as written.

I would like to reiterate that International Paper supports the IBC as a national model representing a safe and up-to-date standard for the building industry. We urge you to recommend adoption of the IBC without the proposed amendments.

Sincerely,

Adrian Blocker
General Manager
Wood Products Division

cc: Rosario Marin
Kate Dargan